

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

DECLARATION OF ASSISTANT
UNITED STATES ATTORNEY
DANIEL G. SAAVEDRA
IN SUPPORT OF AN
ORDER OF GARNISHMENT

-against-

Criminal Docket
CR-20-0220
(Azrack, J.)

THOMAS BLAHA

Defendant,

-and-

MURTAGH, COSSU, VENDITTI
& CASTRO-BLANCO, LLP

Garnishee.

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Daniel Saavedra hereby declares as follows:

1. I am an Assistant United States Attorney, of counsel to John J. Durham, United States Attorney for the Eastern District of New York, attorney for the United States of America, and am responsible for the collection of the judgment against the defendant Thomas Blaha.

2. This garnishment proceeding was commenced by the filing of an Application for Writ of Continuing Garnishment on October 23, 2024 to enforce the judgment of restitution imposed by the Court on November 2, 2022, in the amount of \$963,877.00, against the defendant Thomas Blaha and in favor of the United States of America.

3. As of March 13, 2025, the defendant has made payments totaling \$854,912.38 toward the restitution judgment. The defendant remains indebted to the United States of America in the amount of \$108,964.62.

4. Pursuant to the Application for a Writ of Continuing Garnishment, as provided in 28 U.S.C. § 3205, the Clerk of the Court issued a Writ of Garnishment dated October 23, 2024 to MURTAGH, COSSU, VENDITTI & CASTRO-BLANCO, LLP, as garnishee.

5. On October 24, 2024, defendant Thomas Blaha was served with, among other things, the Application for Writ Of Garnishment, the Writ of Garnishment, Instructions to the Defendant-Judgment Debtor/Clerk's Notice Of Post-Judgment Garnishment, and related documents.

6. On October 25, 2024, the Garnishee, MURTAGH, COSSU, VENDITTI & CASTRO-BLANCO, LLP, was served with the Application for Writ of Garnishment, Writ of Garnishment, Instructions to the Garnishee and related documents.

7. Defendant Thomas Blaha did not request a hearing, claim an exemption, or otherwise contest or respond to the garnishment proceeding.

8. MURTAGH, COSSU, VENDITTI & CASTRO-BLANCO, LLP served an Answer to the Writ of Garnishment dated November 6, 2024, which was subsequently entered on the docket sheet as Document Number 59 on November 6, 2024 and which stated that it had the following non-earnings property in its custody, control or possession: an unused legal fee retainer with a value of \$5,342.54.

9. MURTAGH, COSSU, VENDITTI & CASTRO-BLANCO, LLP further stated in its answer that no previous garnishments have been issued with respect to the defendant.

10. Defendant Thomas Blaha was notified, more than twenty (20) days before the date of this Order, of his right to a hearing or to file a claim for exemption and has not requested a hearing, claimed an exemption, or otherwise contested the garnishment proceeding.

11. Pursuant to the Writ of Continuing Garnishment and, as provided in 28 U.S.C. § 3205(c) (6), MURTAGH, COSSU, VENDITTI & CASTRO-BLANCO, LLP, as garnishee, was required to withhold and retain, pending further order of the court, any property in which the defendant has a substantial non-exempt interest.

12. Pursuant to 28 U.S.C. § 3205(c)(7), the Court shall issue an order of garnishment directing the garnishee as to the disposition of the defendant's non-exempt interest in the property, after the garnishee files an answer and if no hearing is requested within the required time period.

13. Based on the foregoing, the United States seeks an order that within ten days of service of a certified copy of the Order of Garnishment the garnishee, MURTAGH, COSSU, VENDITTI & CASTRO-BLANCO, LLP, shall issue a check payable to the Clerk of the Court the for the Eastern District of New York, in the amount of \$5,342.54 and that said check be mailed or delivered to the Clerk of the Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, 11201, and that the reference "*United States v. Thomas Blaha*, CR-20-0220" shall be noted on the face of said check.

14. A copy of the instant declaration and the accompanying proposed Order of Garnishment will be e-filed with the court and mailed by first class mail to Thomas Blaha at 17 Meadow Street, Garden City, NY 11530 and to the BOP facility where he is currently incarcerated.

WHEREFORE, the United States of America, respectfully requests that the Court issue an order, requiring that:


Within ten days of service of a certified copy of the Order of Garnishment, the garnishee, MURTAGH, COSSU, VENDITTI & CASTRO-BLANCO, LLP, shall issue a check payable to the Clerk of the Court the for the Eastern District of New York, in the

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amount of \$5,342.54 and that said check be mailed or delivered to the Clerk of the Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, 11201, and that the reference "*United States v. Thomas Blaha*, CR-20-0220" shall be noted on the face of said check.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due and owing to plaintiff, and that the disbursements sought to be taxed have been made in this action or will necessarily be made or incurred in this action.

Dated: Brooklyn, New York
March 13, 2025



DANIEL SAAVEDRA
Assistant U. S. Attorney
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